

J Christopher Jorgensen
Nevada Bar No. 5382
LEWIS ROCA ROTHGERBER CHRISTIE LLP
3993 Howard Hughes Pkwy, Suite 600
Las Vegas, NV 89169
Tel: 702.949.8200
E-mail: cjorgensen@lrrc.com

Attorneys for Defendant
SYNCHRONY FINANCIAL

**UNITED STATE DISTRICT COURT
DISTRICT OF NEVADA**

CATHERINE LILLY,

Plaintiff,

vs.

SYNCHRONY FINANCIAL,

Defendant.

Case No.: 2:16-cv-02687-JCM-VCF

**UNOPPOSED STIPULATION FOR
EXTENSION OF TIME TO FILE A
RESPONSIVE PLEADING**

(First Request)

Plaintiff Catherine Lilly and Defendant Synchrony Financial (“Defendant”), through their attorneys, request this Court pursuant to Federal Rule of Civil Procedure 6(b) for an extension of time for Defendant to file its responsive pleading to Catherine Lilly’s (“Plaintiff”) Complaint.

1. Plaintiff filed her Complaint on November 22, 2016. [DK 1.] Plaintiff served Defendant with the Complaint on December 9, 2016, so that its responsive pleading is due on December 30, 2016.

2. Defendant recently retained counsel for the above-captioned lawsuit.

4. Defendant requires additional time to investigate the allegations of the complaint and therefore respectfully requests a 28-day extension of time to file its responsive pleading, on or before January 27, 2017.

5. This is Defendant’s first request for an extension of time, and the deadline for Defendant’s response pleading has not been extended before.

6. This request is not made for purposes of delay.

1 7. On December 29, 2016, counsel for Defendant sent an email to counsel for
2 Plaintiff to learn whether Plaintiff had any objection to the relief sought by this motion,
3 Plaintiff's counsel has agreed to this extension.

4 **IT IS SO AGREED**

5 DATED this 30th day of December 2016.

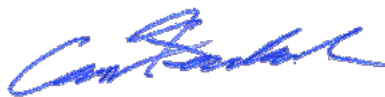
6 LEWIS ROCA ROTHGERBER CHRISTIE LLP

7
8 By: /s/J. Christopher Jorgensen
9 J Christopher Jorgensen (SBN 5382)
10 3993 Howard Hughes Pkwy., Ste. 600
11 Las Vegas, NV 89169
12 Attorneys for Defendant SYNCHRONY
13 FINANCIAL

14 HAINES & KRIEGER, LLC

15 By: /s/David H. Krieger
16 David H. Krieger
17 8985 S. Eastern Avenue, Suite 350
18 Henderson, NV 89123
19 dkrieger@hainesandkrieger.com
20 Attorneys for Plaintiff Catherine Lilly

21 **IT IS SO ORDERED:**

22 

23 UNITED STATES MAGISTRATE JUDGE

24 DATED: 12-30-2016
25 _____